

REMARKS

Applicants request favorable reconsideration, withdrawal of all outstanding rejections, and allowance of this application in view of the foregoing amendments and the following remarks.

Claims 1-7 and 9-19 are pending, of which Claims 1 and 9 are independent. Claims 1, 4, 9, 11, 15, 18, and 19 have been amended. Support for the amendments can be found throughout the originally-filed disclosure, for example, at least in paragraphs [0016], [0023],[0024], and [0026]-[0028] of the specification. Thus, Applicants submit that no new matter has been presented.

Claims 1-3, 5-7, 9-10, 12-14, and 17-18 were rejected under 35 U.S.C. § 103(a) over Janacek et al. (U.S. Patent No. 6,684,248) in view of Poplawski et al. (U.S. Patent Application Publication No. 2003/0208441). Claims 4 and 11 were rejected under 35 U.S.C. § 103(a) over Janacek et al. in view of Poplawski et al. and Fung et al. (U.S. Patent Application Publication No. 2002/0055909). Claims 16 and 19 were rejected under 35 U.S.C. § 103(a) over Janacek et al. in view of Poplawski et al. and Choubey et al. (U.S. Patent No. 7,305,430). Without conceding the propriety of these rejections, Applicant has amended independent Claims 1 and 9 to distinguish the present invention over the references cited by the Office Action, and submit that independent Claims 1 and 9, as well as the claims dependent thereon, are patentably distinct from the cited references for at least the following reasons.

Applicants submit that the cited art, whether taken individually or in combination, does not teach or suggest many features of the present invention, as recited in independent Claims 1 and 9. Applicants, therefore, respectfully traverse the rejections. Nevertheless, without conceding the propriety of the rejections and solely to expedite prosecution, Applicants have

amended independent claims 1 and 9 to clarify the distinctions between the present invention and the cited references. Accordingly, Applicants submit that independent Claims 1 and 9 patentably define the invention over the cited references, for at least the following reasons.

Claim 1 is directed to a method for facilitating access to messages and Claim 9 is directed to a method for a business to provide customer access to a private message. One feature of these methods is storing the message in a common storage area of a database storage system together with all other messages stored in the database storage system, such that all messages are stored in the common storage area. In order to retrieve these messages, the messages stored in the common storage area of the database storage system are searched for the first identifier to find the message associated with the first identifier to be viewed by the intended customer recipient.

As discussed in paragraph [0023] of the specification, this feature, in conjunction with other features of Applicants' invention, contemplates dynamic access of a message, regardless of the number of intended recipients thereof or the size of the message, from a common storage area. This is in contrast to a so-called "static inbox functionality," wherein messages sent to a particular user are stored separately from messages sent to other users.

Janacek et al. does not teach or suggest searching messages stored in a common storage area of a database to find messages for a first intended recipient by matching a first identifier with a message associated with the first identifier. Rather, Janacek et al. teaches that a private mail store is created for each user (see Column 5, lines 1-6) and that a username and password are then used to access a private inbox (see Column 5, lines 13-24). On the other hand, in the present invention, messages associated with first intended recipient and a second intended recipient are stored in a common storage area. As such, these messages must be searched to

determine which messages are associated with an intended recipient. As the messages of the Janacek et al. patent are separated into private message stores created for each recipient, there is no need to search the messages stored in a common storage area of a database to find messages for a first intended recipient by matching a first identifier with a message associated with the first identifier. Instead, Janacek et al. teaches that access is provided to a private inbox after authenticating the login against a user database (see Column 8, lines 10-17). Accordingly, Janacek et al. fails to teach or suggest searching messages stored in a common storage area of a database to find messages for a first intended recipient, as recited in amended independent Claims 1 and 9.

Poplawski et al. relates to an electronic bill presentment and payment system and method. The Office Action cited Poplawski et al. to teach a message alert system, in which an intended recipient is prompted to create or register a second identifier. Applicants have not found any disclosure in Poplawski et al. regarding searching messages stored in a common storage area of a database to find messages for a first intended recipient by matching a first identifier with a message associated with the first identifier, as recited in amended independent Claims 1 and 9.

Fung et al. relates to a technique for web site account and e-commerce management from a central location. The Office Action cited Fung et al. to teach the use of an identifier that is a physical characteristic of the user that is identifiable by a biometric identification system. Applicants have not found any disclosure in Fung et al. regarding searching messages stored in a common storage area of a database to find messages for a first intended recipient by matching a first identifier with a message associated with the first identifier, as recited in amended independent Claims 1 and 9.

Choubey et al. relates to a technique for reducing data storage requirements on mail servers. The Office Action cited Choubey et al. to teach storing only a single copy of an email with multiple recipients in a common storage space. Importantly, however, the technique of Choubey et al. only stores an email in a common storage space if the email has multiple recipients and if the total storage space required is less than a predetermined threshold value. Otherwise, the email message is copied to a separate Inbox folder of each recipient. (See Column 4, lines 23-50.) Thus, Choubey et al. does not store a message in a common storage area of a database together with all other messages stored in the database, such that all messages are stored in the common storage area. Further, Applicants have not found any disclosure in Choubey et al. regarding searching messages stored in a common storage area of a database to find messages for a first intended recipient by matching a first identifier with a message associated with the first identifier, as recited in amended independent Claims 1 and 9.

Applicants submit that Janacek et al., Poplawski et al., Fung et al., and Choubey et al., whether considered individually or in combination, do not suggest features of the invention defined by Claims 1 and 9, and thus the invention of Claims 1 and 9 would not have been obvious over these cited documents. Therefore, Applicants submit that independent Claims 1 and 9 are allowable over the cited art. Each of the remaining claims are dependent, either directly or indirectly, on one of independent Claims 1 and 9, and are allowable by virtue of their dependency, and for further defining patentable features of Applicants' invention. Independent consideration thereof is requested.

Applicants respectfully submit that this application is in condition for allowance and request an early Notice of Allowance.

Applicants' undersigned attorney may be reached in our Washington, D.C., office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Lawrence A. Stahl/

Lawrence A. Stahl
Attorney for Applicants
Registration No. 30,110

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200
LAS:JDS:ayr

FCBS_WS 3036135v1